# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 23-CH 2 3 - 1 - 067

v.

[18 U.S.C. §§ 2422(b), 2251(a), 2252A(a)(5)(B), § 2252A(b)(2).]

MICHAEL A. CONNOR,

Defendant.

#### **INDICTMENT**

#### **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

Between approximately March 25, 2022, and August 18, 2022, in the State and Eastern District of Wisconsin and elsewhere,

#### MICHAEL A. CONNOR,

using a facility and means of interstate commerce, did knowingly attempt to persuade, induce, entice, and coerce a person who had not yet attained the age of 18 years to engage in sexual activity for which the defendant could be charged with a criminal offense, namely, sexual contact and sexual intercourse in violation of Wisconsin Statute Section 948.02(2) (second-degree sexual assault of a child).

In violation of Title 18, United States Code, Section 2422(b).

## **COUNT TWO**

## THE GRAND JURY FURTHER CHARGES THAT:

Between approximately August 10, 2022, and August 18, 2022, in the State and Eastern District of Wisconsin and elsewhere,

# MICHAEL A. CONNOR,

attempted to knowingly employ and use, a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely: a visual depiction of a minor engaged in sexually explicit conduct, which visual depiction would have been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and which visual depiction was intended to be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

# **COUNT THREE**

## THE GRAND JURY FURTHER CHARGES THAT:

1. On or about August 18, 2022, in the State and Eastern District of Wisconsin,

#### MICHAEL A. CONNOR

knowingly possessed matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a minor who had not attained the age of 12 years, and which had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported by a means of interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included a file identified by the following partial file names:

Partial File Name	Description		
e56a4d6	The video is 52 seconds in length and depicts three completely naked juveniles and another subject who is off screen and whose hand is visible. A naked boy, approximately 5-8 years of age, is laying on his back with his elbows bent and hands behind his head. His knees are bent with his legs apart and his feet touching each other just below his buttocks. Two naked girls are seated alongside of the boy; both girls appear to be 4-7 years old. One girl begins to perform oral sex on the boy, placing his penis in her mouth while the other girl begins kissing the boy's mouth with her mouth. There is an additional hand of someone off camera who is fondling the boy's genital area.		
60d898	The photograph depicts a prepubescent female kneeling on her hands and knees on what appears to be a bed. The child is naked aside from a pair of underwear pulled down, stretched between her parted thighs. The child is facing away from the camera but looking back over her shoulder. She has what appears to be a bruise on her left hip area. The camera angle is from behind the child and focused on her bare buttocks, anus, and vagina. Based on the body structure of this child and lack of		

developmental signs, her estimated age is between
 6-9 years old.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and 2252A (b)(2).

## FORFEITURE NOTICE

Upon conviction of the offenses set forth in the indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all visual depictions described in Title 18, Sections 2252 and 2256, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2252, and shall forfeit any property, real or personal, used or intended to be used to commit or promote the commission of such offenses; including, but not limited to: any other equipment, instrumentalities, and items used or intended to be used in the transportation, shipment, production, receiving, distribution, or possession of child pornography.

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GREGORY J. HAANSTAD United States Attorney